

FILED

SEP 12 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTINA WEAVER,
WENDELL RAGSDALE,
BRADLEY QUINELLE WARREN,
TAYLOR D. JAMES, and
HALEY S. JAMES,

Defendants.

4:19CR752 ERW/PLC

INDICTMENT

The Grand Jury charges that:

INTRODUCTION

1. Cellular telephone carriers install their communication equipment on cellular telephone towers. These cellular towers are owned and maintained by corporations that rent out space on their towers to cellular carriers, allowing the carriers to install their telephone equipment on the towers. This allows communication equipment for multiple cellular carriers to be installed on one cellular tower. The renting and sharing of space on one cellular tower allows for greater cellular network coverage by the cellular carriers without the need for over-construction of such towers.

2. Cellular carriers install copper grounding bars and copper wiring at cellular tower sites to prevent damage to the tower and the communication equipment in the event of an electrical storm. A lightning strike on the tower without proper grounding would result in disruption of telephone service and damage to the various carriers' infrastructure during times when a communications network is vital.

3. The United States Department of Defense (DOD), Federal Emergency Management Administration (FEMA), Treasury Department, Department of Justice (DOJ), Federal Bureau of Investigation (FBI), United States Postal Service, and Homeland Security rely on cellular telephone and wireless digital service for their military and civil defense functions. Cellular towers are used and intended to be used for military and civil defense functions of the United States.

4. Crown Castle Tower, American Tower Service, Tower Asset, SBA Communications, White Rock Holdings, LLC and other corporations own and operate shared wireless communication towers used by the wireless industry, including cellular telephone carriers in the Eastern District of Missouri and elsewhere.

5. Verizon Wireless, U.S. Cellular, T-Mobile, AT&T, Sprint, Roberts Wireless, and AT Communications are cellular telephone carriers operating in the Eastern District of Missouri and elsewhere.

COUNT ONE
(CONSPIRACY: 18 U.S.C. § 371)

6. The allegations contained in paragraphs 1-5 of the indictment are re-alleged and incorporated by reference as if stated in full herein.

7. From on or about April 3, 2018 through on or about August 1, 2018, in the Eastern District of Missouri and elsewhere, the defendants CHRISTINA WEAVER, WENDELL RAGSDALE, BRADLEY QUINELLE WARREN, TAYLOR D. JAMES, and HALEY S. JAMES and others both known and unknown to the Grand Jury, knowingly and unlawfully combined, conspired, confederated and agreed together and with each other to commit the following offense, that is:

to willfully and maliciously injure and destroy any of the works, property, and materials of a telephone line, system and other means of communication, used and intended to be used for military and civil defense functions of the United States, and to willfully and maliciously interfere in any way with the working and use of any such line and system, and to attempt and conspire to do such an act.

In violation of Title 18, United States Code, Section 1362.

Object, Ways, Manners, and Means of the Conspiracy

The ways, manner, and means by which the conspiracy was carried out included, but were not limited to, the following:

8. The object of the conspiracy was for defendants CHRISTINA WEAVER, WENDELL RAGSDALE, BRADLEY QUINELLE WARREN, TAYLOR D. JAMES, and HALEY S. JAMES to obtain money by stealing copper grounding bars and copper wiring from cellular telephone towers and thereafter selling the stolen copper to metal salvage dealers in exchange for cash.

9. It was further part of the conspiracy for defendant CHRISTINA WEAVER to provide an automobile to defendants WENDELL RAGSDALE, BRADLEY QUINELLE WARREN, TAYLOR D. JAMES, and HALEY S. JAMES to drive to cellular tower cites in the Eastern District of Missouri and elsewhere to steal copper from cellular towers and thereafter to drive to salvage dealers to sell the stolen copper.

10. It was further part of the conspiracy for defendants CHRISTINA WEAVER, WENDELL RAGSDALE, BRADLEY QUINELLE WARREN, TAYLOR D. JAMES, and HALEY S. JAMES to enter onto over 80 cellular tower sites located in 21 different jurisdictions in the Eastern District of Missouri and elsewhere, which were owned and operated by Crown Castle Tower, American Tower Service, Tower Asset, SBA Communications, White Rock

Holdings, LLC, Verizon Wireless, U.S. Cellular, T-Mobile, AT&T, and Sprint and other corporations to maliciously and forcibly remove and steal copper grounding bars and copper wiring which were the property of cellular telephone carriers, thereby injuring and damaging cellular communications systems in the affected areas.

11. It was further part of the conspiracy that defendants WENDELL RAGSDALE, BRADLEY QUINELLE WARREN, TAYLOR D. JAMES, and HALEY S. JAMES cut the power lines that supplied power to the cellular towers disrupting cellular service in the affected areas.

12. It was further part of the conspiracy that defendants TAYLOR D. JAMES, and HALEY S. JAMES, after stealing and cleaning copper from cellular towers, would thereafter drive to salvage dealers in the Eastern District of Missouri and elsewhere to sell the copper for cash.

Overt Acts

In furtherance of the conspiracy and to affect its objects, the following acts were committed in the Eastern District of Missouri and elsewhere:

13. Between on or about April 3, 2018, through on or about July 31, 2018, defendant CHRISTINA WEAVER found cell tower locations on her cell phone for purposes of stealing copper wire from the aforementioned locations.

14. Between on or about April 3, 2018 through on or about July 31, 2018, defendants CHRISTINA WEAVER, WENDELL RAGSDALE, BRADLEY QUINELLE WARREN, TAYLOR D. JAMES, and HALEY S. JAMES drove to cellular tower sites, located in the Eastern District of Missouri and elsewhere.

15. Between on or about May 17, 2018, through on or about May 25, 2018, defendant HALEY S. JAMES sold copper wire to Bare Bright Copper Wire Scrap in Belleville, Illinois.

16. Between on or about July 18, 2018, and on or about July 30, 2018, defendant

HALEY S. JAMES sold copper wire to American Recycling in Belleville, Illinois.

17. On or about August 1, 2018 defendant TAYLOR D. JAMES sold copper wire to American Recycling in Belleville, Illinois.

18. On or about the following dates and in the following locations in the Eastern District of Missouri and elsewhere, defendants CHRISTINA WEAVER, WENDELL RAGSDALE, BRADLEY QUINELLE WARREN, TAYLOR D. JAMES, and HALEY S. JAMES did enter and conspire to enter onto cellular telephone towers and maliciously injure, destroy and steal copper grounding bars and copper wiring belonging to the following cellular telephone carriers:

A. Washington County, Illinois

19. On or about April 3, 2018, in Nashville, Illinois, at a cell tower located at County Highway 27 copper grounding bars and copper wiring belonging to Verizon Wireless, AT&T, and American Tower.

B. Callaway County, Missouri

20. On or about April 24, 2018, in Fulton, Missouri, at a cell tower located at 2990 State Road DD copper grounding bars and copper wiring belonging to U.S. Cellular, AT&T, Roberts Wireless, and AT Communications.

21. On or about May 1, 2018, in Fulton, Missouri, at a cell tower located at 4190 County Road 215 copper grounding bars and copper wiring belonging to Crown Castle International and Verizon Wireless.

22. On or about May 4, 2018, in Fulton, Missouri at a cell tower located at 5371 County Road 204 copper grounding bars and copper wiring belonging to AT&T and Sprint Wireless.

C. Saint Genevieve County, Missouri

23. On or about April 30, 2018, in Saint Genevieve, Missouri, at a cell tower located at 17895 Ozora Outer Road copper grounding bars and copper wiring belonging to Verizon Wireless.

24. On or about May 7, 2018, in Saint Genevieve, Missouri, at a cell tower located at 20736 Gisi Road copper grounding bars and copper wiring belonging to AT&T Wireless.

25. On or about May 10, 2018, in Saint Genevieve, Missouri, at a cell tower located at 16178 Flieg Drive copper grounding bars and copper wiring belonging to Verizon Wireless.

26. On or about May 16, 2018, in Saint Mary, Missouri, at a cell tower located at 26721 Cemetery Road copper grounding bars and copper wiring belonging to Sprint Communications.

27. On or about May 19, 2018, in Saint Genevieve, Missouri, at a cell tower located at 10639 Kimmel Lake Road copper grounding bars and copper wiring belonging to AT&T Wireless.

28. On or about June 8, 2018, in Saint Genevieve, Missouri, at a cell tower located at 20736 Gisi Road copper grounding bars and copper wiring belonging to Sprint Communications.

29. On or about June 19, 2018, in Bloomsdale, Missouri, at a cell tower located at 60 Tower Lane copper grounding bars and copper wiring belonging to Sprint and AT&T Wireless.

30. On or about June 20, 2018, in Saint Genevieve, Missouri, at a cell tower located at 13626 New Offenburg Road copper grounding bars and copper wiring belonging to T-Mobile Corporation and SBA Communications.

D. Montgomery County, Missouri

31. On or about May 9, 2018 in Montgomery City, Missouri, at a cell tower located at 103 Powell Road copper grounding bars and copper wiring belonging to Verizon Wireless and U.S. Cellular.

E. Cooper County, Missouri

32. On or about May 14, 2018 in Blackwater, Missouri, at a cell tower located at 3985

M Highway copper grounding bars and copper wiring belonging to U.S. Cellular.

33. On or about May 16, 2018 in Blackwater, Missouri, at a cell tower located at Highway Z and Interstate 70 copper grounding bars and copper wiring belonging to AT&T.

34. On or about May 27, 2018 in Boonville, Missouri, at a cell tower located at 24749 Highway 98 copper grounding bars and copper wiring belonging to Tower Asset.

35. On or about June 20, 2018 in Blackwater, Missouri, at a cell tower located at 17818 Highway Z copper grounding bars and copper wiring belonging to Verizon Cellular.

36. On or about July 25, 2018 in Bunceton, Missouri, at a cell tower located at 13411 Bee Lane copper grounding bars and copper wiring belonging to AT&T.

F. Boone County, Missouri

37. On or about May 14, 2018 in Blackwater, Missouri, at a cell tower located at 3985 M Highway copper grounding bars and copper wiring belonging to U.S. Cellular.

38. On or about May 15, 2018 in Rocheport, Missouri, at a cell tower located at 12133 West Old Rocheport Road copper grounding bars and copper wiring belonging to AT&T Wireless.

39. On or about May 15, 2018, in Rocheport, Missouri at a cell tower located at 950 North Route O copper grounding bars and copper wiring belonging to T-Mobile Wireless.

40. On or about May 17, 2018, in Rocheport, Missouri at a cell tower located at 12121 West Old Rocheport Road copper grounding bars and copper wiring belonging to Verizon Wireless.

G. Cape Girardeau County, Missouri

41. On or about May 18, 2018, in Cape Girardeau, Missouri at a cell tower located at Highway 61 and County Road 530 copper grounding bars and copper wiring belonging to T-Mobile.

42. On or about May 19, 2018, in Cape Girardeau, Missouri at a cell tower located at 2197 State Highway E copper grounding bars and copper wiring belonging to AT&T Cellular.

H. Effingham County, Illinois

43. On or about May 30, 2018, in Mason, Illinois at a cell tower located at 8395 East 250th Avenue copper grounding bars and copper wiring belonging to T-Mobile.

44. On or about June 7, 2018, in Mason, Illinois at a cell tower located at 3416 North 950th Street copper grounding bars and copper wiring belonging to Verizon Wireless and Crown Castle.

45. On or about July 1, 2018, in Effingham, Illinois at a cell tower located at 10351 North 800th Street copper grounding bars and copper wiring belonging to AT&T.

I. Fayette County, Illinois

46. On or about May 30, 2018, in Farina, Illinois at a cell tower located at 2658 East 825 Avenue copper grounding bars and copper wiring belonging to Sprint.

47. On or about June 27, 2018, in Mulberry Grove, Illinois at a cell tower located at North 100 Street and US 40 copper grounding bars and copper wiring belonging to Sprint.

48. On or about June 30, 2018, in Brownstown, Illinois at a cell tower located at 1550 E and 1650 N copper grounding bars and copper wiring belonging to AT&T.

J. New Madrid County, Missouri

49. On or about June 1, 2018, in New Madrid, Missouri at a cell tower located at Highway 61 and County Road 634 copper grounding bars and copper wiring belonging to Verizon Wireless.

50. On or about June 8, 2018, in New Madrid, Missouri at a cell tower located at 500 County Highway 806 copper grounding bars and copper wiring belonging to AT&T.

K. Perry County, Missouri

51. On or about June 15, 2018, in Perryville, Missouri at a cell tower located at PCR 520 copper grounding bars and copper wiring belonging to AT&T.

L. Cumberland County, Illinois

52. On or about June 28, 2018 in Toledo, Illinois, at a cell tower located at 760 County Road 1175E copper grounding bars and copper wiring belonging to White Rock Holdings, LLC and AT&T.

53. On or about June 29, 2018 in Toledo, Illinois, at a cell tower located at 615 County Road 1850E copper grounding bars and copper wiring belonging to Sprint.

54. On or about July 5, 2018 in Montrose, Illinois, at a cell tower located at 128 County Road 800E copper grounding bars and copper wiring belonging to T-Mobile, AT&T, Sprint, and Verizon Wireless.

55. On or about July 7, 2018 in Montrose, Illinois, at a cell tower located at 897 County Road 200N copper grounding bars and copper wiring belonging to American Tower, AT&T, Sprint Cellular.

56. On or about July 7, 2018 in Casey, Illinois, at a cell tower located at Route 40 Country Road 1975E copper grounding bars and copper wiring belonging to American Tower.

M. Saline County, Missouri

57. On or about July 20, 2018, in Nelson, Missouri, at a cell tower located at 31874 118th Road copper grounding bars and copper wiring belonging to Verizon Wireless.

58. On or about July 20, 2018, in Marshall, Missouri, at a cell tower located at Hemlock Avenue South copper grounding bars and copper wiring belonging to AT&T.

59. On or about July 26, 2018, in Marshall, Missouri, at a cell tower located at 25347

159th Road copper grounding bars and copper wiring belonging to AT&T.

60. On or about July 31, 2018, in Blackburn, Missouri, at a cell tower located at 10749 Highway 20 copper grounding bars and copper wiring belonging to Verizon.

N. Morgan County, Missouri

61. On or about July 22, 2018, in Syracuse, Missouri, at a cell tower located at 7400 Lipton Road copper grounding bars and copper wiring belonging to AT&T.

O. Pettis County, Missouri

62. On or about July 24, 2018, in Houstonia, Missouri, at a cell tower located at 25302 Highway CC copper grounding bars and copper wiring belonging to U.S. Cellular.

P. Lafayette County, Missouri

63. On or about July 30, 2018, in Concordia, Missouri, at a cell tower located at I-70 and Route T, 1002 Industrial Drive copper grounding bars and copper wiring belonging to AT&T, Sprint, and Crown Castle.

Q. Audrain County, Missouri

64. On or about July 30, 2018, in Thompson, Missouri, at a cell tower located at 1128 Highway 15 copper grounding bars and copper wiring belonging to U.S. Cellular.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(MALICIOUS INTERFERENCE WITH COMMUNICATION LINES: 18 U.S.C. § 1362)

On or about May 9, 2018, in Montgomery City, Missouri, within the Eastern District of Missouri, defendants BRADLEY QUINELLE WARREN and CHRISTINA WEAVER, while aiding and abetting each other, did willfully and maliciously injure and destroy the works, property, and materials of a telephone line and system and other means of communication, used and intended to be used for military and civil defense functions of the United States, and did

willfully and maliciously interfere with the working and use of such a line and such a system, specifically, a cellular telephone tower located at 103 Powell Road, and the copper grounding bars and copper wires attached thereto belonging to Verizon Wireless and U.S. Cellular.

All in violation of Title 18, United States Code, Sections 1362 and 2.

A TRUE BILL.

FOREPERSON

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